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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 12/26/24

MEMORANDUM ENDORSED

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December 26, 2024

By ECF

The Honorable Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Gannon Bond*, 24 Cr. 091 (GHW)

Dear Judge Woods:

I write with the Government's and co-counsel's consent to respectfully request an additional week with which to file our Reply in the above-captioned matter. Our Reply to the Government's Opposition is presently due January 6, 2025, should the Court grant the request, the Reply would be due January 13, 2025.

I have been on trial in Supreme Court, Kings County in the matter of *People v. Sanford Solny*, IND-70212-23/001 since December 2, 2024. The trial is a complicated real estate fraud trial involving twelve victims, approximately 30 witnesses and voluminous discovery. While we broke for the holidays, I traveled with my family on the 21st of December and will be returning on Saturday, December 28th, 2024. The Government's submission, received on December 23, 2024, is lengthy and will require the additional time to review and prepare an appropriate response all while continuing our trial preparation and other pending matters. The request to file our Reply by January 13, 2025, will not alter the existing schedule as trial is scheduled for June 16, 2025.

I apologize for any inconvenience. Thank you for your courtesy and consideration.

Respectfully submitted,

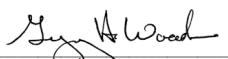
/s/ James Kousouros
James Kousouros, Esq.
Counsel for Mr. Bond

Cc. All Counsel of Record (By ECF)

Application granted. Defendant Bond's application for an extension of time to file his Reply to the Government's Opposition, Dkt. No. 94, is granted. The deadline for Defendant Bond to file his Reply is extended to January 13, 2025. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 94.

SO ORDERED.

Dated: December 26, 2024


GREGORY H. WOODS
United States District Judge